

Ohio EPA RCRA AND VAP MOA Track: Remedial Action Work Plan

Required Information Component of the Remedial Action Work Plan	Yes or No (choose one)	Provide response below. Please reference the location [including document name, section and page number(s)] within the Phase II documentation where this information or evaluation is located and also answer any specific questions as indicated.
1. General Information About Remedial Activities:		
<p>1a. Specify the type of remedy or remedial activities that will be employed.</p>		<p>(Check all that apply)</p> <p><input type="checkbox"/> Institutional Control(s)</p> <p><input type="checkbox"/> Engineering Control(s)</p> <p><input type="checkbox"/> Other Remedy(ies) - please specify:</p>
<p>1b. Summarize planned remedial activities by completing a table with the following information (see Attachment 1):</p> <ul style="list-style-type: none"> • The Identified area where the remedy will be employed • Affected media to be addressed by the remedy • Pathways and/or potential receptors addressed • Applicable points of compliance • Type of remedy including a brief description of the remedy (e.g., commercial land use restriction, excavation of soil, containment/ remediation of ground water by pumping and treating, etc.) • Whether the remedy will be completed prior to issuance of the NFA Letter • Whether interim measures are necessary • Whether an O&M Plan is necessary <p>NOTE: If the remedy will not be completed prior to issuance of the NFA Letter, an O&M Plan is necessary. Refer to Form 17 for guidance on the content of an Operation and Maintenance Plan.</p>		
2. Description of Remedial Activities:		
<p>2a. Will all remedial activities be completed prior to issuance of the NFA Letter for the property? Indicate in the column to the right where in the work plan this information is located.</p>	<p>Yes: ___ _No: ___ _</p>	<p>Section: Page Number:</p>

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<p>2b. Identify the section of the work plan where a schedule for completion of the remedial activities is located.</p>		<p>Section: Page Number:</p>
<p>2c. Identify the section of the work plan that details how remedial activities competed prior to issuance of the NFA Letter will be confirmed to verify that the remedial activities comply with applicable standards.</p> <p>Note: The work plan must provide for the submittal of appropriate documentation to Ohio EPA to confirm that the remedial activities result in the property complying with applicable standards. This documentation must be included in an addendum to the Phase II report and submitted to Ohio EPA as part of the NFA Letter. The documentation is subject to Ohio EPA review and approval.</p>		<p>Section: Page Number:</p>
<p>2d. Identify the section of the work plan that defines the remedy to be used for each identified area of the property.</p>		<p>Section: Page Number:</p>
<p>2e. Identify the COCs in each affected media that exceed applicable standards. Indicate in the column to the right where in the work plan this information is located.</p>		<p>Section: Page Number:</p>
<p>2f. Note the section in the work plan that describes how remedial activities will be used to comply with applicable standards.</p>		<p>Section: Page Number:</p>
<p>2g. Does the ground water contain COCs in excess of unrestricted potable use standards?</p> <p>If YES, provide the section in the work plan that discusses how the volunteer will comply with ground water response requirements.</p>	<p>Yes: ___ No: ___</p>	<p>Section: Page Number:</p>
<p>2h. If YES to Question 2g, are the ground water response requirements contained in paragraphs (E)(2)(a)(v), (E)(2)(c)(vi), (E)(3)(a)(v), and (E)(3)(c)(vi) of OAC 3745-300-10 applicable to the property?</p> <p>If YES, the work plan must detail how the response requirements will be met, including those activities that must be completed prior to issuance of the NFA Letter.</p>	<p>Yes: ___ No: ___</p>	<p>Section: Page Number:</p>
<p>2i. Will a use restriction (i.e. environmental covenant) meeting the requirements of ORC 5301.82 be used to demonstrate compliance with applicable standards? Indicate in the column to the right where in the work plan this information is located.</p> <p>If YES, do not record the environmental covenant. A copy of the proposed environmental covenant must be submitted to Ohio EPA for prior review by Ohio EPA's legal office. A copy of the proposed environmental covenant must be attached to this form.</p>	<p>Yes: ___ No: ___</p>	<p>Section: Page Number:</p>

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<p>2j. Do the planned remedial activities require operation and maintenance or will the remedial activities be incomplete at the time of issuance of the NFA Letter? Indicate in the column to the right where in the work plan this information is located.</p> <p>If YES, an O&M Plan is required. Attach a copy of the completed O&M Plan to the Remedial Action Work Plan. See Form 17 for guidance on the content of an O&M plan. Note that compliance with applicable standards must be achieved within five years or another time frame agreed to by the director.</p>	Yes: ___ No: ___	Section: _____ Page Number: _____
<p>2k. Are interim measures necessary to protect public health and safety and the environment prior to implementation of the final remedy or do interim measures need to be incorporated into the final remedy during maintenance or repair of the final remedy? Indicate in the column to the right where in the work plan this information is located.</p> <p>If YES, go to Question 3.</p> <p>If NO, go to Question 4.</p>	Yes: ___ No: ___	Section: _____ Page Number: _____
3. Description of Interim Measures:		
<p>3a. Will risk mitigation measures be used to mitigate exposure during construction or excavation activities?</p> <p>If YES, a "Risk Mitigation Plan" is necessary. Indicate in the column to the right where in the work plan this information is located. Ohio EPA may be contacted for guidance on the content of a Risk Mitigation Plan.</p>	Yes: ___ No: ___	Section: _____ Page Number: _____
<p>3b. Will interim measures be used during implementation of or repair of the final remedy, or both?</p> <p>If YES, indicate in the column to the right where in the work plan this information is located.</p>	Yes: ___ No: ___	Section: _____ Page Number: _____
<p>3c. Indicate where in the work plan the exposure pathways, affected media and receptors being addressed by the Interim measures are described.</p>		Section: _____ Page Number: _____
<p>3d. Indicate where in the work plan it is describe how the interim measures will ensure protectiveness.</p>		Section: _____ Page Number: _____
4. Public Notice:		
<p>4a. Has the Public Notice of the volunteer's submission of</p>	Yes: ___	Section: _____

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<p>the Remedial Action Work Plan been issued?</p> <p>If YES, a copy of the Public Notice must be attached to this form.</p> <p>Note: The Public Notice must be issued upon submittal of the Remedial Action Work Plan, to allow for public comment prior to Ohio EPA's approval of the work plan.</p>	<p>No: ____</p>	<p>Page Number: _____</p>
<p>4b. Has documentation been submitted to verify the public notice was published by a "local newspaper"?</p> <p>Note: Proof of publication must be submitted to Ohio EPA prior to Ohio EPA's approval of the work plan to demonstrate that a 30-day comment period has occurred.</p>	<p>Yes: ____ No: ____</p>	<p>Section: _____ Page Number: _____</p>
<p>4c. Is the volunteer aware of any public interest in the property?</p>	<p>Yes: ____ _No: ____</p>	<p>If YES, please explain the nature of the public interest (attach additional sheets as necessary):</p>
<p>4d. Has the volunteer scheduled a public meeting regarding this project?</p> <p>Note: An Ohio EPA representative needs to attend any public meeting addressing the Remedial Action Work Plan or other RCRA AND VAP MOA matters.</p>	<p>Yes: ____ No: ____</p>	<p>If yes, please provide the date and location where the public meeting is to be held.</p> <p>Date: _____ Time: _____ Location: _____</p>
<p>4e. Has the volunteer held a public meeting regarding this project?</p>	<p>Yes: ____ No: ____</p>	<p>If yes, please provide the date and location where the public meeting was held.</p>

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<p>If YES, a summary of the topics raised by the public at the public meeting must be attached to this form.</p>		<p>Date: _____ Time: _____ Length: _____ Location: _____ Section: Page Number:</p>
<p>END OF FORM #16</p>		

**Attachment 1
 MOA Remedial Action Work Plan
 Summary of Planned Remedial Activities Table**

Identified Area	Affected Media	Exposure Pathway and Receptor	Point of Compliance	Type of Remedy (including a brief description)	